

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

HECTOR MORA, *et al.*,
on behalf of themselves, FLSA Collective
Plaintiffs, and Class Members,

Plaintiffs,

-against-

BAREBURGER GROUP LLC, *et al.*,

Defendants.

Case No.: 16-cv-4373 (RML)

**NOTICE OF PLAINTIFFS' MOTION
TO ENFORCE THE SETTLEMENT
AGREED UPON BY THE PARTIES**

Please take notice that upon the accompanying Memorandum of Law and annexed materials, Plaintiffs HECTOR MORA, VICTORINO GALLARDO, RAUL REYES, JOHAN GOMEZ, CONSTANTINO MAXIMO, TOMAS CUIN, RICARDO MORALES, JOSE JUAN MAYA ALVAREZ, ANGEL ORTEGA ALMONTE, ALEJANDRO GRAJALES, CIRILO OLIVIER GARCIA, DOMINGO EDUARDO GOMEZ MARTINEZ, OCTAVIO AARON LOPEZ, JOSE PEREZ, and HERSON TORRES, by their undersigned attorneys, hereby moves for judicial enforcement of the Term Sheet, which was agreed upon by the parties.

Dated: New York, New York
February 24, 2020

Respectfully submitted,
LEE LITIGATION GROUP, PLLC

By: /s/ C.K. Lee
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Plaintiffs and the Class*